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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

C.M., on her own behalf and on behalf of her
minor child, B.M.; L.G., on her own behalf and
on behalf of her minor child, B.G.; M.R., on her
own behalf and on behalf of her minor child,
J.R.; O.A., on her own behalf and on behalf of
her minor child, L.A.; and V.C., on her own
behalf and on behalf of her minor child, G.A.,

Plaintiffs,

v.

United States of America,

Defendant.

No. CV-19-05217-PHX-SRB

**PLAINTIFFS' UNOPPOSED
MOTION TO EXTEND
WRITTEN DISCOVERY
DEADLINE**

A.P.F. on his own behalf and on behalf of his
minor child, O.B.; J.V.S. on his own behalf and
on behalf of his minor child, H.Y.; J.D.G. on his
own behalf and on behalf of his minor child,
M.G.; H.P.M. on his own behalf and on behalf of
his minor child, A.D.; M.C.L. on his own behalf
and on behalf of his minor child, A.J.; and R.Z.G.
on his own behalf and on behalf of his minor
child, B.P.,

Plaintiffs,

v.

United States of America,

Defendant.

No. CV-20-00065-PHX-SRB

1 Plaintiffs in *C.M. et al. v. U.S.* (CV-19-05217) (“*C.M.*”) and *A.P.F. et al. v. U.S.*
2 (CV-20-00065) (“*A.P.F.*”) respectfully request that the Court extend the deadline for
3 service of written discovery by **7 days**, to **June 7, 2022**. Plaintiffs’ requested extension
4 will not affect any other deadlines in the Amended Case Management Order.

5 Under the Court’s Amended Case Management Order (*A.P.F.* ECF No. 144;
6 *C.M.* ECF No. 144), the current deadline for service of all written discovery is May 31,
7 2022. The parties have a discovery dispute conference before the Court on June 2,
8 2022, and briefing is ongoing with regard to Plaintiffs’ Motion For Judicial
9 Determination of Privilege Claim (*A.P.F.* ECF No. 167; *C.M.* ECF No. 188) and
10 Motion to Compel In Camera Review of Documents (*A.P.F.* ECF No. 169; *C.M.* ECF
11 No. 184). Plaintiffs believe that the outcome of one or more of these issues will impact
12 the written discovery and documents they seek. Therefore, Plaintiffs respectfully
13 request an additional seven (7) days for all parties to serve written discovery.

14 Counsel for Plaintiffs and the United States conferred regarding Plaintiffs’
15 request for a seven-day extension. The United States does not oppose Plaintiffs’
16 request. A proposed Order is submitted herewith.

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18 Respectfully submitted this 31st day of May, 2022,
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